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SDMS DocID 584978

MEMORANDUM

TO: Jard Co. File

FROM: Stan Corneille, Environmental Engineer
Sites Management Section

DATE: August 5, 1991

RE: Action Memo - EPA Removal

On Friday August 2, 1991, at 11:40 a.m. I spoke to Dean Tagliaferro EPA, OSC about the draft action memo he prepared for the administrator of EPA Region 1. I received a faxed copy of this document on July 31, 1991 to review and comment on. Dean asked me to call him with any comments I might have within a couple of days. The draft document is attached to this memo.

I pointed out one or two errors or omissions in the memo. For the most part, I had questions about the process which he answered to my satisfaction. The site has to be evaluated by ATSDR for the risk to human health before any soil can be removed. More soil sampling may be necessary before ATSDR can make an assessment.

I asked Dean if tanks and the buried concrete vaults would be removed. He said that an underground metal tank would be removed but the concrete vaults/drywells would probably be left in place and filled in. Any hazardous contents of any underground structure will be removed and disposed of. I wanted to make sure that soil is sampled around the outside of any underground tank. Dean said this would probably be the case but did not strongly commit to this or the removal of any contaminated soil around these structures. He said any contaminated soil identified will have to be evaluated by ATSDR for the human health effect.

Bulk containers and the contents of tanks (surface or subsurface) as well as the filled capacitors left in the building can be disposed of within the next six months. It will probably take 15 - 18 months before any surface or subsurface contamination will be dealt with.

SC/lb1774



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I

60 WESTVIEW STREET, LEXINGTON, MASSACHUSETTS 02173

TELECOPIER REQUEST

TO Stan Corneille
OFFICE Vt. Haz Waste PHONE _____
TELECOPIER (802) 244-5141 CONFIRMING _____

FROM Dean Tagliaterra
OFFICE EPA Lexington, MA PHONE (617) 860-4625

NUMBER OF PAGES TO FOLLOW 11

Action Memo, Any comments?
-Thanks Dean

DATE SENT 7/31/91

TIME 1400

BY Dean Tagliaterra

CONFIRMED YES NO

WHEN SENT AND VERIFIED RETURN TO _____

MEMORANDUM**DATE:**

SUBJ: Request for a Removal Action at the Jard Company Site,
Bennington, Bennington County, Vermont--ACTION MEMORANDUM

FROM: Dean Tagliaferro, On-Scene Coordinator
Emergency Planning and Response Branch

TO: Julie Belaga
Regional Administrator

THRU: Edward J. Conley, Director
Environmental Services Division

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action described herein for the Jard Company Site, Bowen Road, Bennington, Bennington County, Vermont.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID#: VTD048141741
SITE ID# : L2
CATEGORY : Time-Critical

A. SITE DESCRIPTION**1. Background**

The Jard Company (Jard) manufactured small capacitors, small non-fluid transformers and small motors from 1969 to 1989. The oil-filled capacitors were wound, assembled, impregnated with oil, degreased, tested and painted. The transformers were wound, assembled, varnished and tested.¹

In 1989 the company ceased its manufacturing operations and filed for Chapter 7 bankruptcy (no reorganization). The court appointed trustee for Jard, Laurence H. Levy, Inc.,

¹Draft Environmental Assessment of the Jard Property in Bennington, Vermont prepared by Wehran Engineering, November 1989

contracted with [redacted] an Engineering to perform a Phase I Site Assessment. The purpose of this assessment was to conduct an environmental audit prior to a possible sale of the property. The report was completed in November 1989 and states that approximately fifty-four 55-gallon drums and twenty-five five gallon pails containing paints, solvents, thinners, degreasers, waste trichloroethylene, and other compounds remain at the Site. The drums are located outside the building in a fenced-in storage area. The report also states that approximately 21 cubic yards of rejected capacitors filled with oil remain at the Site.

The Wehran Phase I Report identified the presence of several tanks and/or catch basins. A twelve by twenty-four inch catch basin is located inside a warehouse, and three concrete vaults/dry wells, two four inch stand pipes (an indication of an underground storage tank), and an aboveground 2,000 gallon tank are located outside of the warehouse. A former employee for Jard stated that the underground tank or vaults may have been used to store stormwater or wastewater as part of a recirculation cooling system.

The analytical results from a sediment sample collected in one of the concrete vaults had concentrations 11,500 parts per million (ppm) zinc, 280 ppm polychlorinated biphenyls (PCBs), 810 ppm bis (2-ethylhexyl) phthalate (BEHP)², 12 ppm toluene and 1.3 ppm ethylbenzene. A sample from the second concrete vault had concentrations of 191,000 ppm zinc, 98 ppm PCBs and 1,400 ppm BEHP. A sediment sample collected from the catch basin located inside the warehouse had concentrations of 753 ppm zinc, 4,900 ppm PCBs, 36,000 ppm BEHP, 2 ppm trichlorethylene and 1 ppm trichloroethane. The aboveground tank was labelled ORM-E, however, no samples were collected and there was no information on the contents, if any, of the tank.

Nine soil samples were also collected from the Site. Table 1 presents the maximum concentrations of compounds detected in the soil samples.

²BEHP is also referred to as di-n-octyl phthalate or DOP